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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 JONATHAN OSHA BELL,
14 Defendant.
15

Case No. 2:03-cr-278-LDG-PAL-1

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Sixth Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United
17 States Attorney, and Elham Roohani, Assistant United States Attorney, counsel for the United
18 States of America, and Rene L. Valladares, Federal Public Defender, and Paul Riddle Assistant
19 Federal Public Defender, counsel for Jonathan Osha Bell that the Revocation Hearing currently
20 scheduled on Tuesday May 29, 2018 at 10:00 a.m., be vacated and continued to a date and time
21 convenient to the Court, but no earlier than sixty (60) days.

22 This Stipulation is entered into for the following reasons:

23 1. Mr. Bell has a pending petition alleging a violation of his federal probation. The
24 alleged violation is a new crime which is currently pending in state court. Mr. Bell's state court
25 case has been continued and the outcome of the state court case will greatly influence the way
26 the parties seek to resolve the pending petition.

1 2. Since the state proceeding is inexorably linked to the allegations contained in
2 the petition, the parties agree to the need for continuance.

3 3. Therefore, a 60 day continuance is requested to allow Mr. Bell sufficient time to
4 resolve his state court case before proceeding with the alleged violation of conditions of
5 supervision.

6 4. Defendant is not incarcerated and does not object to a continuance.

7 5. Additionally, denial of this request for continuance could result in a
8 miscarriage of justice.

9 This is the fourth request for continuance filed herein.

10 DATED this 24th day of May, 2018.

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12 RENE L. VALLADARES
13 Federal Public Defender

DAYLE ELIESON
United States Attorney

14 By /s/ Paul Riddle

By /s/ Elham Roohani

15 PAUL RIDDLE
16 Assistant Federal Public Defender

ELHAM ROOHANI
Assistant United States Attorney

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4 **UNITED STATES DISTRICT COURT**
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ORDER

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13 Based on the Stipulation of counsel and good cause appearing,

14 IT IS THEREFORE ORDERED that the Revocation Hearing currently scheduled on
15 Tuesday, May 29, 2018 10:00 a.m., be vacated and continued to August 6, 2018, at the
16 hour of 9:00 a.m.

17 DATED this 25th day of May, 2018.

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20 UNITED STATES DISTRICT JUDGE
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